

1 going to be.

2 They can be used for the local
3 agencies own knowledge but it has nothing to
4 do with the tier level. So regardless of the
5 fact -- let's say for example that Mr. 'Titus'
6 is relieved of his duty to register at some
7 point in time. If Washington State ratifies
8 the Adam Walsh Act, and this says right in the
9 guidelines he would then have to register
10 again and would be subject to lifetime
11 registration as a Tier 3 offender.

12 Q Okay, does it change the community
13 notification at all in terms of what
14 information would be involved in the type
15 prepared?

16 MR. LYON: Objection as to
17 relevance.

18 JUDGE SIPPEL: I will overrule the
19 objection. This is light, you just want to
20 touch on it. Go ahead.

21 THE WITNESS: It would include
22 employment information which is not now

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 included. It would include vehicle
2 information which is not now included. It
3 would include license information which is not
4 now included. Which means it would also
5 include motor vehicle licenses, an actual
6 digital copy of their drivers license. It
7 would include FCC licenses.

8 It would include anything that has
9 a moniker where they are known by.

10 BY MR. KNOWLES-KELLETT:

11 Q Would it include email addresses?

12 A It would include email addresses.
13 Yes, it would.

14 JUDGE SIPPEL: So it sounds to me
15 like this new proposal, this new legislation
16 rather in one sense, well in many senses seems
17 to be that the common word for that would be
18 draconian. I mean this is really bringing the
19 hammer down.

20 THE WITNESS: It is bringing the
21 hammer down. Unfortunately Your Honor, we're
22 going from a system where we are not looking

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 at the science anymore. We are now taking all
2 sex offenders and lumping them into one barrel
3 and saying -- actually three barrels and
4 saying you're either this based on your crime
5 or conviction.

6 And anything that you may have done
7 in treatments positively, anything you may
8 have done in your life to get yourself back on
9 the straight and narrow doesn't make any
10 difference. You fall under this category,
11 boom that's it, you're done. It seems a
12 little draconian to me.

13 JUDGE SIPPET: Well I am not going
14 to comment on it myself. But it certainly
15 sounds like it's headed to the Supreme Court
16 because it's adopted.

17 Has there been anything filed yet.
18 The law is effective. It's just that the
19 states have until 2009 to comply. Is that --
20 or is it --

21 THE WITNESS: Half of the states
22 have already complied. And Ohio being one of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 them. There's already challenges that are
2 making their way through the system.

3 JUDGE SIPPEL: Sure, but it is
4 voluntary on a state by state basis?

5 THE WITNESS: Yes, but if a state
6 chooses not to then --

7 JUDGE SIPPEL: You pointed that
8 out.

9 THE WITNESS: -- they lose their --
10 ten percent of their --

11 JUDGE SIPPEL: They lose Federal
12 money.

13 THE WITNESS: -- Federal money,
14 yes.

15 JUDGE SIPPEL: Can we move on now.

16 BY MR. KNOWLES-KELLETT:

17 Q Would it have any different effect
18 on the access to minors by sex offenders?

19 MR. LYON: Continued objection.

20 JUDGE SIPPEL: Yes, I'm going to
21 sustain that one.

22 MR. KNOWLES-KELLETT: Okay.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 BY MR. KNOWLES-KELLETT:

2 Q Well, I have a couple of questions
3 regarding getting your help reading the
4 documents that you produced to us.

5 What is referred to -- the
6 documents refer to a manifest injustice.
7 Could you explain what a manifest injustice
8 is?

9 JUDGE SIPPEL: Where is that.
10 Where do you find a reference to that?

11 MR. KNOWLES-KELLETT: It says it
12 several times in terms of his sentencing.
13 Manifest injustice of 65 weeks.

14 JUDGE SIPPEL: Which exhibit are
15 you going through now?

16 MR. KNOWLES-KELLETT: Exhibit 4.

17 JUDGE SIPPEL: Okay.

18 MR. LYON: If I can help I think
19 it's in -- at least one of his juvenile
20 adjudications. Given the length of time it's
21 taking to find this can we at least --

22 THE WITNESS: It's on page 14.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 JUDGE SIPPEL: Thank you. Now
2 what's your question?

3 MR. KNOWLES-KELLETT: I just wanted
4 him to define the term manifest injustice.
5 It's a sentencing term used in --

6 JUDGE SIPPEL: Where do you see it.
7 I'm on 14.

8 THE WITNESS: Okay, it's down where
9 it says 12/15/89 and then the paragraph right
10 underneath that. Sentence to a manifest
11 injustice of 65 weeks.

12 JUDGE SIPPEL: I'm missing it.

13 MR. LYON: Next to the last
14 paragraph on page 14, Your Honor.

15 JUDGE SIPPEL: Page 14.

16 MR. KNOWLES-KELLETT: Second
17 paragraph from the bottom, second line from
18 the bottom of the paragraph.

19 JUDGE SIPPEL: Oh I see, I got you.
20 Titus was sentenced to a manifest injustice of
21 65 weeks. That's a term of art?

22 MR. KNOWLES-KELLETT: Yes, and it's

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 used a number of times, Your Honor. And I
2 just was unable to locate it. And it's just -
3 - when we go to do findings it --

4 JUDGE SIPPEL: All right.

5 BY MR. KNOWLES-KEILETT:

6 Q Could you describe what a manifest
7 injustice is?

8 A In the Juvenile Court system
9 manifest injustice has the same meaning as
10 exceptional sentence in the adult system.

11 Q Okay, what is exceptional sentence
12 in the adult system?

13 A Means that the Judge has gone
14 beyond the standard range of sentencing.

15 Q Okay, and why would they do
16 something like that generally. I'm not asking
17 in this particular -- what sort of
18 circumstances would

19 A If a crime was particularly
20 egregious or there was excessive violence,
21 multiple convictions a Judge can choose to
22 give an exceptional sentence, or in this case

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 a manifest injustice.

2 Q Okay, and now the really simple
3 one. They refer repeatedly to the Tri-Cities
4 area. Are you familiar with the term Tri-
5 Cities area?

6 A I am.

7 Q Okay, could you describe for us
8 what the Tri-Cities area is?

9 A That's Richland, Pasco, and
10 Kennewick.

11 Q Okay, where --

12 A Those cities -- their in the
13 southern, south central part of Washington
14 State.

15 Q Okay.

16 A And those three cities are in close
17 proximity to each other. Kind of like they
18 call the Twin Cities in Minneapolis, St. Paul.

19 JUDGE SIPPEL: That's south of
20 Seattle then. Is that right?

21 THE WITNESS: It's southeast.

22 JUDGE SIPPEL: Southeast of

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Seattle.

2 THE WITNESS: Seattle would be on
3 the west coast.

4 JUDGE SIPPEL: Right.

5 THE WITNESS: And this is -- the
6 Tri-Cities are in the south central part of
7 Washington State.

8 MR. TITUS: Almost the southeast
9 corner.

10 JUDGE SIPPEL: Almost the southeast
11 corner did you say?

12 MR. TITUS: That's correct.

13 BY MR. KNOWLES-KELLETT:

14 Q Okay, in doing Mr. Titus' most
15 recent risk assessment what factors did you
16 consider to be important?

17 A The --

18 JUDGE SIPPEL: Well can we get the
19 date of when it was done first?

20 MR. KNOWLES-KELLETT: Okay.

21 JUDGE SIPPEL: I want to start with
22 dates on these things.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 MR. KNOWLES-KELLETT: Okay.

2 BY MR. KNOWLES-KELLETT:

3 Q I believe you did -- you double
4 checked it after this whole FCC matter. Is
5 that your testimony?

6 MR. LYON: Objection, as to form.

7 JUDGE SIPPEL: Sustained.

8 MR. KNOWLES-KELLETT: All right,
9 this is just introductory.

10 JUDGE SIPPEL: I know, but your
11 question started out was with respect to doing
12 such an assessment. My question was what date
13 was it done?

14 MR. KNOWLES-KELLETT: Okay.

15 JUDGE SIPPEL: And then you go from
16 there. What date was the second assessment or
17 the most current one?

18 MR. KNOWLES-KELLETT: I'm actually
19 talking about the most current one.

20 JUDGE SIPPEL: The most current.
21 What date was that?

22 THE WITNESS: I'd have to look it

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 up.

2 BY MR. KNOWLES-KELLETT:

3 Q Okay, how many assessments have
4 you done and when were they done?

5 A Well I have done three assessments.
6 One was the one done by the committee in 1994.

7 Q Right.

8 A One was done right after the
9 incident in Mercer Island and I don't recall
10 that date exactly.

11 JUDGE SIPPEL: 2004 is Mercer
12 Island?

13 MR. KNOWLES-KELLETT: Yes.

14 THE WITNESS: And then I did one
15 using the current scoring tool that the State
16 of Washington mandates and that was done just
17 prior to meeting with you back in -- was it
18 March or April?

19 MR. KNOWLES-KELLETT: In February
20 I visited your office and --

21 THE WITNESS: February.

22 MR. KNOWLES-KELLETT: -- I believe

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 you did it shortly thereafter, after I asked
2 you to pull the file.

3 JUDGE SIPPEL: Can we have a year
4 please?

5 MS. LANCASTER: 2008.

6 JUDGE SIPPEL: Thank you.

7 MR. LYON: Would counsel accept a
8 stipulation that it was done on February 26,
9 '08?

10 MR. KNOWLES-KELLETT: Yes.

11 JUDGE SIPPEL: And the other one
12 was done in 2004 in connection with the
13 Meridian Island --

14 THE WITNESS: Mercer Island.

15 MS. LANCASTER: Mercer Island.

16 JUDGE SIPPEL: Okay, all right.

17 All right, which one do you want to go to
18 next?

19 MR. KNOWLES-KELLETT: I want to go
20 to the most recent one.

21 JUDGE SIPPEL: Okay.

22 BY MR. KNOWLES-KELLETT:

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Q Can you explain how you did that
2 risk assessment, the most recent one?

3 JUDGE SIPPEL: I still want to know
4 why it was done. I'm still not clear why it
5 was done. This was done on an actuarial
6 basis, right?

7 THE WITNESS: Yes, Your Honor.

8 JUDGE SIPPEL: And why was it done?

9 THE WITNESS: Just to make sure
10 that based on that actuarial model, if we had
11 done it in 1997, that he would have scored out
12 as a Level 3 which is what we had made him.

13 Or would he have been a Level 2.
14 Using this model he would have been Level 2
15 then I'd have had some problems explaining
16 that you know as to my justification for
17 making him a 3.

18 JUDGE SIPPEL: Well he was made a
19 3 -- when was he made a 3?

20 THE WITNESS: 2004.

21 JUDGE SIPPEL: Okay, so after
22 Mercer Island he was made a 3?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 THE WITNESS: Right.

2 JUDGE SIPPEL: And was that 3 based
3 on the subjective system?

4 THE WITNESS: That was yes, that
5 was based on his activities in Mercer Island.
6 It was based on an automobile accident that he
7 had in Seattle in which him and the driver got
8 into a verbal altercation.

9 When she asked him if he was a
10 police officer and he wouldn't tell her
11 because he was acting like one. All those
12 things told us that he was a higher risk than
13 what we initially had him.

14 JUDGE SIPPEL: All right.

15 THE WITNESS: So using the
16 actuarial model in 2008 I rescored him using
17 all of the information that we had and he came
18 out well into the Level 3 category.

19 JUDGE SIPPEL: But there was really
20 no incident that triggered the 2008 actuarial
21 assessment. It was just to kind of bring his
22 situation up to the state of the art so to

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 speak. I'm paraphrasing myself, so.

2 THE WITNESS: Well honestly, Your
3 Honor the -- what caused me to do it was the
4 fact that you know knowing that we were going
5 to be doing a hearing, a Court hearing at some
6 point in time and, you know explaining how we
7 came up with a risk assessment and
8 anticipating someone saying, you mean to tell
9 me that you have a risk assessment on this
10 person but you've never even done the
11 actuarial.

12 You know, so just to make sure that
13 we were being fair we did the actuarial risk
14 assessment using all of the information that
15 we have on him to see if we had done this in
16 1997 when this scoring first came into being
17 where would he have been. And so we did that,
18 I did that.

19 JUDGE SIPPEL: But this was done.
20 But the 2008 assessment was done for purposes
21 of this litigation, of this hearing, not for
22 purposes of something else like the Mercer

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 Island incident?

2 THE WITNESS: That's correct, Your
3 Honor.

4 JUDGE SIPPEL: Okay.

5 BY MR. KNOWLES-KELLETT:

6 Q Is it common when you pull a file
7 to double check your risk assessment?

8 A If there is - if we have a reason
9 to pull a file because of some sort of
10 activity. Maybe it's a patrol officer sending
11 us a field interrogation report on some sex
12 offender they found in a park. We'll pull a
13 file and if there's somebody that they have
14 not have the actuarial model done on yet we
15 will go back and do that.

16 Q Now in '04 you didn't actually do
17 the actual -- use the actuarial model?

18 A Did not.

19 Q Okay, did you use the experience
20 you had with the actuarial model though to do
21 the risk assessment?

22 A Well that's it. I sat on the end

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 of sentence review board. So I knew based on
2 , you know all of the information that we had
3 on Mr. Titus that he was going to score a
4 Level 3.

5 Q And at that time you raised him to
6 a Level 3?

7 A That's correct.

8 Q Okay.

9 MR. KNOWLES-KELLETT: It's your
10 witness.

11 CROSS-EXAMINATION

12 BY MR. LYON:

13 Q Thank you Detective Shilling for
14 coming across the country to be here. Is it
15 fair to say that public has been largely
16 misinformed about the recidivism rate of sex
17 offenders?

18 A Yes.

19 Q And the threat that strangers pose
20 to children?

21 A Yes.

22 Q The public largely overestimates

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 the rate of sex offender recidivism don't
2 they?

3 A They do.

4 Q And the public largely
5 overestimates the threat that strangers pose
6 to children?

7 A That's correct.

8 Q You're familiar with the study done
9 by Harris and Hanson in 2004?

10 A I am.

11 Q And Dr. Hanson particularly is one
12 of the top researchers in the field of sex
13 offended research, correct?

14 A He is.

15 Q And Harris and Hanson study
16 involved more than 4,700 subjects?

17 A I believe so, yes.

18 Q And this sample is large enough in
19 your view to be statistically significant?

20 A Yes.

21 Q And the Harris and Hanson study
22 involved a 15 year follow-up period?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 A Yes it does.

2 Q And from this sample of more than
3 4,700 subjects studied over 15 years Drs.
4 Harris and Hanson found that 73 percent of
5 sexual offenders had not been charged with or
6 convicted of another sexual offense.

7 A That's correct.

8 Q Now in Washington State the
9 recidivism rate is even lower than that isn't
10 it?

11 A It is.

12 Q It's much lower isn't it?

13 A I'm not sure how much lower. But
14 it is lower.

15 Q Well the Washington State Institute
16 for Public Policy. I believe you mentioned
17 that organization earlier?

18 A Yes I did.

19 Q Is that an agency in Washington
20 State area?

21 A It is a agency -- it is a
22 governmental agency that is specifically put

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 together to assist the legislature in topics
2 of interest. They act on legislative
3 requests.

4 Q Okay, the Washington State
5 Institute for Public Policy studied recidivism
6 in Washington didn't they find that only a 3.9
7 percent recidivism rate over a five year study
8 period?

9 A I'd have to take a look and see
10 which study it is you're talking about and
11 what the particulars were.

12 Q Does that sound right to you?

13 A The 3.5 --

14 Q 3.9.

15 A The 3.9 sounds like it was the
16 study that they did that took a look at sex
17 offenders who had completed the sex offender
18 treatment program at Twin Rivers Correctional
19 Center and had gone out in -- I'm sorry, Your
20 Honor.

21 JUDGE SIPPET: That's all right.

22 THE WITNESS: I kept telling myself

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 this morning remember to turn your phone off.
2 Obviously I forgot.

3 BY MR. LYON:

4 Q You were answering what you thought
5 the 3.9 percent was.

6 A Yes, I believe that was persons who
7 had completed the sex offender treatment
8 program at Twin Rivers Correctional Center.

9 They've done a number of studies
10 and that's why I'm just not sure what study it
11 is you're referring to.

12 Q The first review of Mr. Titus that
13 found him a Level 2, you mentioned that you
14 were on the end of sentence review committee.
15 Who else was on that committee?

16 A Okay, I didn't get two different
17 things.

18 Q Okay, correct me please.

19 A The very first committee that made
20 him a Level 2 was made up of Seattle Police
21 Department personnel.

22 Q Okay.

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 A There was an Assistant Chief,
2 myself, the head of our Records Bureau, one of
3 the Administrative Staff out of the Chief of
4 Police office, there was a Captain in Charge
5 of the Sexual Assault and Child Abuse Unit,
6 and the Seattle Police Department Legal
7 Advisor.

8 Q Okay, there were not any
9 psychologists?

10 A There were not.

11 Q No psychiatrists?

12 A No.

13 Q No sex offender researchers?

14 A No.

15 Q Is there a written record of the
16 material that the committee that made the
17 first determination reviewed?

18 A This information that I gave to
19 counsel that I think it's 4.

20 Q Okay, is there any notes of the
21 deliberations of the committee in existence?

22 A No, other than the final

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 determination of Mr. Titus and all the other
2 offenders that were reviewed that day and what
3 their risk scores were.

4 Q Are any notes or minutes made of
5 this committee meeting?

6 (No response.)

7 Q Let me rephrase that. Were there
8 any notes or minutes made of the deliberations
9 of the committee that day?

10 A No.

11 Q Any reason why not?

12 A I mean we just didn't take notes of
13 stuff. We had all the file materials there
14 that we reviewed and then we just made a final
15 determination on the sheet that you have a
16 copy of.

17 Q Do you -- is there like a show of
18 hands for 1, and 2, and 3. Or how --

19 A That's exactly how it went.

20 Q So do you start with 3 and go to 1
21 or do you start with 1 and go to 3?

22 A We would say -- after reviewing all

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 of the information how many people think that
2 he should be a Level 1. We saw a show of
3 hands. How many think he should be a Level 2.

4 In most cases, you know these were
5 pretty clear cut cases. Most people agreed if
6 somebody was 1, 2, or 3 and it wasn't like you
7 had a lot of division there.

8 Q And that was the case with Mr.
9 Titus?

10 A As far as I recall.

11 Q Okay, now help me out then with
12 this end of sentence review board. When was
13 that created?

14 A 1997.

15 Q Okay, and you were one of the
16 original members of it?

17 A Yes.

18 Q And the -- did the end of sentence
19 review board -- well tell me what the purpose
20 of that -- strike that.

21 Who else was on the end of sentence
22 review board in 1997?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234-4433

www.nealrgross.com

1 A Victoria Roberts who was the Chair.
2 She is with Department of Corrections. She
3 was the head of the Community Protection Unit.

4 There was a woman from Kris Coleman
5 who was a psychologist with the Department of
6 Social and Health Services. She -- the
7 Department of Social and Health Services
8 Division of Developmental Disabilities.

9 There was another woman, I can't
10 remember her name right now. She was with
11 DSHS in the Victim Notification Unit.

12 There was a psychologist from
13 Western State Hospital. There was another law
14 enforcement officer representing the counties.
15 I represented the cities. City law
16 enforcement and he represented county law
17 enforcement.

18 There was somebody from Child
19 Protection Services, CPS. There was -- I'm
20 trying to remember what it was then and not
21 what it is now.

22 Q Anyone else you can think of?

NEAL R. GROSS

COURT REPORTERS AND TRANSCRIBERS
1323 RHODE ISLAND AVE., N.W.
WASHINGTON, D.C. 20005-3701

(202) 234 4433

www.nealrgross.com